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[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

This Document Relates To:

*Target Corporation, et al. v. AU Optronics
Corporation, et al., Case No. CV:10-4945 SI*

Master Docket No. 07-m-1827 SI
Case No. CV:10-4945 SI

**STIPULATION RE EXTENSION OF
TIME TO RESPOND TO SECOND
AMENDED COMPLAINT, WAIVER
OF SERVICE, AND [PROPOSED]
ORDER**

1 Whereas, plaintiffs Target Corporation; Sears, Roebuck and Co.; Kmart Corporation; Old
 2 Comp Inc.; Good Guys, Inc.; RadioShack Corporation; and Newegg Inc. ("Plaintiffs") filed a
 3 second amended complaint ("SAC") in the above-captioned case adding as defendants Philips
 4 Electronics North America Corporation, Samsung SDI Co. Ltd., Samsung SDI America, Inc., and
 5 Sanyo Consumer Electronics Co., Ltd. (the "Newly Named Defendants") on September 9, 2011;

6 Whereas, Plaintiffs wish to avoid the burden and expense of serving process on the Newly
 7 Named Defendants;

8 Whereas, the Newly Named Defendants wish to confirm a date certain for their time to
 9 respond to the SAC; and

10 Whereas the parties wish to set a briefing schedule if the Newly Named Defendants elect
 11 to file motions to dismiss the SAC.

12 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
 13 undersigned counsel, on behalf of their respective clients, Plaintiffs, on the one hand, and the
 14 Newly Named Defendants, on the other hand, as follows:

15 1. The Newly Named Defendants waive service of the SAC under Federal Rule of
 16 Civil Procedure 4(d). This stipulation does not constitute a waiver by the Newly Named
 17 Defendants of any other substantive or procedural defense, including but not limited to the
 18 defenses of lack of personal or subject matter jurisdiction and improper venue.

19 2. The deadline for the Newly Named Defendants to move to dismiss, answer, or
 20 otherwise respond to the SAC will be November 18, 2011.

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3. If the Newly Named Defendants file motions to dismiss the SAC, any such motions shall be heard on the following schedule:

Oppositions to be filed by: December 14, 2011

Replies to be filed by: December 23, 2011

Hearing Date: January 6, 2012

Dated: October 18, 2011

/s/ Nathaniel J. Wood

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**Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the
filing of this document has been obtained from Eric S. O'Connor, Brendan P. Cullen and
Allison A. Davis.**

IT IS SO ORDERED.

Dated: 10/24, 2011



Susan Illston, United States District Judge

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